



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

JOHN INMAN (AIS# 234821),

*

*

Plaintiff,

*

V.

*

2:05-CV-526-T

STATE OF ALABAMA, ET AL.

*

Defendants

*

AFFIDAVIT OF WINFRED D. WILLIAMS, M.D.

STATE OF ALABAMA

COUNTY OF ELMORE

BEFORE ME, Lynn Lambert a notary public in and for said County and State, personally appeared **WINFRED WILLIAMS, M.D.**, and being duly sworn, deposed and says on oath that the averments contained in the foregoing are true to the best of his ability, information, knowledge and belief, as follows:

"My name is Winfred Williams. I am a medical doctor and am over twenty-one years of age. I am personally familiar with all of the facts set forth in this affidavit. I have been licensed as a physician in Alabama since 1999, and have been board certified in family medicine since 1999. From July 1, 2004 through April 30, 2005, I served as the Medical Director for Staton Correctional Facility located in Elmore County, Alabama. I currently serve as the Medical Director for the Tutweiler Correctional Facility. At all pertinent times, my employment has been with Prison Health Services, Inc. ("PHS"), the company which currently contracts with the Alabama Department of Corrections to provide medical services to inmates.

John Inman (AIS# 234821) was incarcerated as an inmate at Draper Correctional Facility at all times pertinent to this lawsuit. I am familiar with Mr. Inman and was involved in medical services provided to him at Staton Correctional Facility.¹ I have reviewed Mr. Inman's Complaint in this action as well as his medical records, (certified copies of which are being produced to the Court along with this Affidavit).

On October 28, 2004 Mr. Inman was involved in an automobile accident when an Alabama Department of Corrections bus in which he was riding collided with another vehicle near Draper. As a precaution, Mr. Inman was immediately transported to the emergency room at Baptist Medical Center South for evaluation.

Mr. Inman was evaluated by Ronald A. Shaw, M.D. who determined that Inman's left index finger was lacerated and that the tip of his left index finger was fractured. Dr. Shaw sutured the laceration and provided Inman with a finger splint. Inman was prescribed Lortab for pain and Keflex, an antibiotic, to ward off possible infection. Dr. Shaw released Mr. Inman from Baptist South the following day.

After Inman returned to Draper, he received extensive x-ray evaluation. Radiologist Thomas J. Payne, III, M.D., determined that Mr. Inman had fractured the distal phalanx of his left index finger. He reviewed x-rays of Mr. Inman's spine and determined that he had suffered no acute injury in the accident. Specifically, Mr. Inman's vertebrae are well aligned and show no evidence of fracture or destructive bone disease. Mr. Inman's lateral cervical spine x-ray showed a bone spur on the C7 vertebrae. This spur is chronic, not acute, and is completely unrelated to the automobile accident in question.

¹ Draper Correctional Facility does not have an infirmary. All of Draper's inmates, including Mr. Inman, are treated at neighboring Staton Correctional Facility.

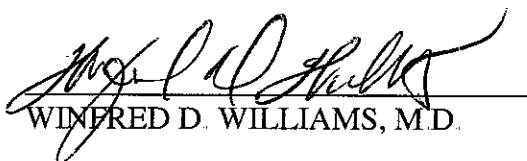
It is my opinion that Mr. Inman does not suffer from dislocated vertebrae as he has stated in his Complaint, nor has Inman's left index finger been severed as he claims. Further, it is my medical opinion that surgery is not indicated for Inman's condition.

In order to treat any inflammation accompanying Mr. Inman's lacerated finger, he was prescribed Naproxen, an anti-inflammatory, as well as Motrin and Ibuprofen for pain. I instructed Mr. Inman regarding exercises designed to increase his finger mobility and issued multiple profiles on his behalf including a "bottom bunk profile" and a "no use of hand profile."

Based on my review of Inman's medical records, and on my personal knowledge of the treatment provided to him, it is my opinion that Inman has been evaluated and treated in a timely and appropriate fashion by PHS and its employees. Inman has been seen and evaluated by the medical or nursing staff, and has been referred to an appropriate care provider and given appropriate care, whenever he has registered any health complaints. At all times, myself and the other healthcare providers at Staton have exercised the same degree of care, skill, and diligence as other similarly situated health care providers would have exercised under the same or similar circumstances. In other words, it is my opinion that the appropriate standard of care has been adhered to at all times in providing medical care, evaluation, and treatment to this inmate.

At no time have I or any of the medical or nursing staff at Staton denied Inman any needed medical treatment, nor have we ever acted with deliberate indifference to any serious medical need of Inman. At all times, Inman's conditions have been addressed as promptly as possible under the circumstances."

Further affiant sayith not.


WINFRED D. WILLIAMS, M.D.

STATE OF ALABAMA)

COUNTY OF ELMORE)

I, Lynn Lambert, a Notary Public in and for said State and County, hereby certify that WINFRED D. WILLIAMS, M.D. who being known to me and who being duly sworn, and whose name is signed to the foregoing document, acknowledged before me on this date that being first informed of the contents of said document, having read the same, and understanding its purpose and effect, voluntarily executed the same upon the above-stated date.

SWORN TO and SUBSCRIBED BEFORE ME on this the 12th day of September, 2005.

Lynn Lambert
NOTARY PUBLIC
My Commission Expires: 8-14-2006

(NOTARIAL SEAL)